



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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COMMISSIONER

January 24, 2003

Cheryl M. Kimball  
Keegan, Werlin and Pabian, L.L.P.  
21 Custom House Street  
Boston, MA 02110

Re: Southern Union Company, D.T.E. 03-3

Dear Ms. Kimball:

Enclosed please find the Department of Telecommunications and Energy's Second Set of Information Requests to Southern Union Company ( "Southern Union" or the "Company") issued in the above-captioned matter. Please submit the Company's responses before 3 p.m., Monday, January 27, 2003.

Thank you for your attention in this matter.

Sincerely,

Elizabeth A. Cellucci  
Hearing Officer

Enc.

cc: Mary Cottrell, Secretary  
Joseph W. Rogers, Office of the Attorney General

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

SECOND SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY  
TO SOUTHERN UNION COMPANY  
D.T.E. 03-3

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Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Southern Union Company, or "Southern Union", or "the Company," the following Information Requests:

**INSTRUCTIONS**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:  
  
Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn, and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If the Company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit one (1) copy of the response to: (1) Elizabeth Cellucci, Hearing Officer; (2) Kevin Brannelly, Rates and Revenues Division; (2) Paul Osborne, Rates and Revenues Division; (3) Joe Passaggio, Rates and Revenues Division (4) Jim Powell, Rates and Revenues Division; (5) Glen Shippee, Rates and Revenues Division; and (6) Becky Hanson, Legal Division.
8. Responses are due by 3 p.m., Monday, January 27, 2003.

D.T.E. 2-1 Refer to Kvapil testimony at 14. Please provide additional details regarding the equity issuance referenced by the Company including:

- a. Is the proposed issuance a private placement or public offering?
- b. Does the Company possess any information regarding likely investor reaction to a new issuance?
- c. Please provide greater detail on the proposed use of proceeds of the equity issue. What exact issues of long or short-term debt are to be retired by the Company?
- d. Does the Company possess data or analyses from the investment community that supports a \$16.00 price for its proposed common equity issuance (e.g., 18.5 million shares x \$16.00 per share)?